

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

PAUL E. PARTRIDGE,
PAUL E. PARTRIDGE, JR.

Plaintiffs,

v.

APPLICA CONSUMER PRODUCTS, INC.,
BRINK'S HOME SECURITY, INC.

Defendants.

Civil Action No. 05-10601-MLW

RECEIVED

Clerk's Office

USDC, Mass.

Date

By

Deputy Clerk

**CO-DEFENDANT BRINK'S HOME
SECURITY, INC.'S CONSENT TO REMOVAL**

Defendant Brink's Home Security, Inc. ("Brink's"), by and through its counsel, hereby
files this Consent to Removal and states as follows:

1. On February 22, 2005, plaintiffs commenced an action styled as Paul E. Partridge
and Paul E. Partridge, Jr. v. Applica Consumer Products, Inc. and Brink's Home Security, Inc.,
Civil Action No. 05-0678, in the Superior Court Department of the Trial Court for Suffolk
County, Commonwealth of Massachusetts.

2. On March 11, 2005, plaintiffs caused the Summons and Complaint to be served
on Brink's.

3. On March 24, 2005, pursuant to 28 U.S.C. § 1441, counsel for Applica Consumer
Products, Inc. ("Applica") filed a Notice of Removal to this Court.

4. The case has now been docketed and assigned the above case number.

5. Brink's hereby consents to removal of this action to this Court.

BRINK'S HOME SECURITY, INC.,

By their attorneys,

Jillian B. Hirsch

Jonathan I. Handler, BBO #561475

Jillian B. Hirsch, BBO #659531

DAY, BERRY & HOWARD LLP

260 Franklin Street

Boston, Massachusetts 02110-3179

(617) 345-4600

March 31, 2005

CERTIFICATE OF SERVICE

I, Jillian B. Hirsch, do hereby certify that I have served the within **Co-Defendant Brink's Home Security, Inc.'s Consent to Removal** by causing a copy to be mailed, first class postage prepaid and addressed to counsel for plaintiffs, Jason E. Cohn, Tommasino & Tommasino, Two Center Plaza, Boston, MA 02810, and counsel for defendant Applica Consumer Products, Inc., Maynard M. Kirpalani, Wilson, Elser, Moskowitz, Edelman & Dicker LLP, 155 Federal Street Boston, MA 02110.

Jillian B. Hirsch
Jillian B. Hirsch